

Quinn,Robert E

From: Quinn,Robert E
Sent: Wednesday, August 28, 2019 7:36 PM
To: 'Darius Charney'
Cc: England, Travis; W, Claudia; Chinyere Ezie
Subject: RE: Next steps on the IA investigation document issue

Ok, thanks.

Again, I don't think a motion is necessary or warranted and will object on those grounds among others. Am happy to discuss further if you'd like, just let me know when and how.

-Rob Quinn. (716) 851-4326.

From: Darius Charney [mailto:dcharney@ccrjustice.org]
Sent: Wednesday, August 28, 2019 12:39 PM
To: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>
Cc: England, Travis <england@nclej.org>; W, Claudia <wilner@nclej.org>; Chinyere Ezie <cezie@ccrjustice.org>
Subject: Re: Next steps on the IA investigation document issue

Rob-

We wanted to let you know that we are planning to file our motion to compel re the IA documents tomorrow or Friday.

Darius

On Wed, Aug 7, 2019 at 1:01 PM Darius Charney <dcharney@ccrjustice.org> wrote:

Rob-

We reviewed the transcript from the May 30 court conference, which is attached here. As we read the Court's comments on pp. 28-29, the parties are required to present discovery disputes that require Court resolution through a formal motion. So it is our intention to file a motion to compel with the Court on this IA investigation documents issue. We will let you know in advance of filing on ECF the date on which we intend to file the motion.

Darius

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Darius Charney
Senior Staff Attorney
Pronouns: He/Him

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666 Broadway, 7th Floor New York, NY 10012
212.614.6475

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